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To:	Examiner Sang K. Klm	From: Kulani Fisher
Fax:	(571) 273-8300	Pages: 17 pages including coversheet
Phon	e:	Date: February 16, 2006
Re:	Response to Office Action - 10/68	6,111
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- 4. Duplicate Copy of Transmittal Letter for Response/Amendment (1 page)
- 5. Response (13 pages)

Application No.: 10/686,111 Attorney Docket No.: 40059-0007

Certificate of Transmission

I hereby certify that this correspondence is being facsimile transmitted to Examiner Sang K. Kim via the USPTO central facsimile number, (571) 273-8300.

February 16, 2006 Date

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40059-0007

FEB 1 6 2006

Serial No.: 10/686,111

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application: Lanny R. Smith

Application No.: 10/686,111

Filed: October 14, 2003

Title: "Universal Shift Apparatus and Method for

Swimming Pool Cover Assembly"

Examiner: KIM, Sang K.

Group Art Unit: 3654

Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450

TRANSMITTAL LETTER FOR RESPONSE/AMENDMENT

Sir:

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Response/Amendment

() Petition to extend time to respond

New fee as calculated below

() Supplemental Declaration

(X) No additional fee

(X) Other:

		CLAIMS	AS AMEN	DED SMALL EN	TITY			****	
FOR	CLAIMS REMAINING AFTER AMENDMENT	NUMBER EXTRA	HIGHES PREVIOU	PRESENT EXTRA		RATE	ADDITIONAL FEES		
TOTAL CLAIMS	37	MINUS		50	= 0		X \$25.00	\$0.00	
INDEP. CLAIMS	4	MINUS		5	= 0		X \$100.00	\$0.00	
[] FIRST PRESENTATION OF A MULTIPLE DEPENTANT CLAIM + \$180.00									
EXTENSION FEE	ON [] 1ST MONTH [] 2ND \$60.00 \$225		MONTH [] 3RD MO 5.00 \$510.00				4TH MONTH \$795.00	\$0.00	
OTHER FEES									
	•		TOTAL A	ADDITIONAL FE	E FOR	THIS	AMENDMENT	\$0.00	

Please charge \$0.00 to Deposit Account 18-0013/40059-0007. At any time during the pendency of this application, please charge any fees required or credit any overpayment to Deposit Account 18-0013/40059-0007 pursuant to 37 CFR 1.25. Additionally please charge any fees to Deposit Account 18-0013/40059-0007 under 37 CFR 1.16, 1.17, 1.19, 1.20 and 1.21. A duplicate of this sheet is enclosed.

I hereby certify that this correspondence is being transmitted to the US Patent and Trademark Office via facsimile number (571) 273-8300 on

February 16, 2006

Number of pages transmitted: 17

Jeffrey K. Riddle

Respectfully submitted,

By:

Kulani Fisher (Reg. No.: 50,987) Attorney/Agent for Applicant(s) Telephone No.: (801) 572-0185

Date: February 16, 2006

40059-0007

DUPLICATE

Serial No.: 10/686,111

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application: Lanny R. Smith

Application No.: 10/686,111

Filed: October 14, 2003

Title: "Universal Shift Apparatus and Method for

Swimming Pool Cover Assembly"

Examiner: KIM, Sang K. Group Art Unit: 3654

Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450

TRANSMITTAL LETTER FOR RESPONSE/AMENDMENT

Sir

Transmitted herewith is/are the following in the above-identified application:

(X) Response/Amendment

- () Petition to extend time to respond
- () New fee as calculated below
- () Supplemental Declaration

(X) No additional fee

(X) Other.

		CLAIMS	AS AMENI	DED SMALL EN	TITY				
FOR CLAIMS REMAINING AFTER AMENDMENT		NUMBER EXTRA		ST NUMBER SLY PAID FOR	PRESENT EXTRA	RATE	ADDITIONAL FEES		
TOTAL CLAIMS			MINUS		= 0	X \$25.00	\$0.00		
INDEP. CLAIMS	4	BUNIM		5	= 0	X \$100.00	\$0.00		
[] FIRST PRESENTATION OF A MULTIPLE DEPENTANT CLAIM + \$180.00									
EXTENSION FEE	ON [] 1ST MONTH \$60.00	[] 2ND \$22	MONTH 5.00	[] 3RD MO \$510.00	,	4TH MONTH \$795.00	\$0.00		
OTHER FEES									
TOTAL ADDITIONAL FEE FOR THIS AMENDMENT									

Please charge \$0.00 to Deposit Account 18-0013/40059-0007. At any time during the pendency of this application, please charge any fees required or credit any overpayment to Deposit Account 18-0013/40059-0007 pursuant to 37 CFR 1.25. Additionally please charge any fees to Deposit Account 18-0013/40059-0007 under 37 CFR 1.16, 1.17, 1.19, 1.20 and 1.21. A duplicate of this sheet is enclosed.

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Respectfully submitted,

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Date: February 16, 2006

10/686,111

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40059-0007

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In the Patent Application of

Lanny R. Smith

Application No. 10/686,111

Filed: October 14, 2003

For:

Universal Shift Apparatus and Method For Swimming Pool Cover Assembly Examiner: KIM, Sang K

Group Art Unit: 3654

RESPONSE

MS – Amendment Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450

Sir:

This is a full and timely response to the non-final Office Action mailed November 16, 2005 (hereinafter "the Office Action"). Reconsideration in view of the following amendments and remarks is respectfully requested.